

EXHIBIT 1

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VIA ELECTRONIC MAIL

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Counsel:

I write to initiate a meet and confer regarding Plaintiffs listed in **Attachment 1**.

PTO #5 requires each Plaintiff to “submit a bona fide ride receipt” from an Uber trip connected to the alleged incident. PTO #5, ¶ 4 (ECF 175). Plaintiffs listed in Attachment 1 have violated PTO #5 and have not provided a bona fide receipt. These cases should be dismissed with prejudice.

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I have included all law firms representing Plaintiffs on Attachment 1 on this communication, as well as Plaintiffs' MDL leadership. Given the fast-moving nature of this docket and impending trials in this matter, it is imperative that we meet and confer on these issues promptly this week. I can make myself available most times this week to accommodate the group's schedules. Please provide your availability to meet and confer this week.

Sincerely,

/s/ Christopher V. Cotton

Christopher V. Cotton
Partner

Attachment 1

1. MDL ID 2642 - Pulaski Law Firm
2. MDL ID 1199 - Levin Simes LLP
3. MDL ID 1384¹ - Peiffer Wolf
4. MDL ID 2774² - Kherker Garcia
5. MDL 1507³ - Nachawati Law Group
6. MDL ID 3841 - Pulaski Law Firm
7. MDL ID 3659 - Pulaski Law Firm

¹ Plaintiff was dismissed without prejudice after the Court granted the withdrawal of counsel on February 3, 2025. Dismissal should be converted to dismissal with prejudice.

² Same Plaintiff as Plaintiff with MDL ID 1384.

³ Dismissed without prejudice on June 2, 2025 due to the failure by Plaintiff to file a notice indicating whether they intended to pursue their action following the withdrawal of Nachawati. Dismissal should be converted to dismissal with prejudice.